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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANETTE DORADO, an individual,
Plaintiff,

v.

SMITH'S FOOD & DRUG CENTERS, INC., a
foreign corporation; DOE INDIVIDUALS I-X,
inclusive; and ROE CORPORATIONS I-X,
inclusive,
Defendants.

Case No: 2:25-cv-00896-JAD-NJK

**~~PROPOSED~~ JOINT DISCOVERY PLAN
AND SCHEDULING ORDER**

***SPECIAL SCHEDULING REVIEW
REQUESTED***

Pursuant to Fed.R.Civ.P.26(f) and Local Rule 26-1, counsel for the parties conducted a Rule 26(f) discovery conference on May 27, 2025. After conferring about the case, the parties submit the following Proposed Joint Discovery Plan and Scheduling Order.

1. PROCEDURAL HISTORY AND DISCOVERY CONDUCTED PRIOR TO REMOVAL:

- Plaintiff's Complaint was filed on January 30, 2025.
- Defendant's Answer was filed on February 25, 2025.
- The Arbitrator was appointed on April 14, 2025.
- Plaintiff served her initial disclosure statement on April 23, 2025.
- The Early Arbitration Conference was held on April 29, 2025.
- The Arbitrator issued the Discovery Order on April 29, 2025.
- The Notice of Removal was filed on May 22, 2025.

2. INITIAL DISCLOSURES: The parties will serve their initial disclosure statements by June 11, 2025, which is 14 days from the filing date of this scheduling order.

1 3. **DISCOVERY CUT-OFF DATE:** All discovery to be completed no later than **November 26,**
2 **2025**, 180 days from the date on which the Parties agreed to this Proposed Joint Discovery Plan.
3 The Parties acknowledge this is a total of 274 days from the day Defendant submitted its Answer.
4 **Statement of the necessity of additional time:** The parties anticipate needing additional time
5 to subpoena medical records, provide those medical records to the parties' experts, depose those
6 medical providers and experts, and resolve any discovery disputes arising from that process. In
7 counsel's experience, medical providers often take longer than anticipated to provide complete
8 sets of medical bills and records, which often necessitates stipulations to extend deadlines. To
9 avoid filing stipulations later in the case, the parties are seeking additional discovery time on the
10 front end to hopefully resolve this matter with as few extensions of the discovery deadlines as
11 possible. Additionally, Defendant is reserving its right to an Independent Medical Examination
12 pursuant to Fed. R. Civ. P. 35 should it become necessary over the course of discovery. The
13 additional time will allow the Defendant to make an informed decision on the necessity of such
14 an examination rather than undertaking the expense prematurely—the Parties intend to use the
15 extra discovery time to facilitate settlement negotiations prior to pricing themselves out of a
16 resolution to the extent possible.

17 4. **AMENDING THE PLEADINGS AND ADDING PARTIES:** Any motion to amend the pleadings
18 or add parties shall be filed by August 28, 2025, which is 90 days prior to the discovery cutoff.

19 5. **EXPERT DISCLOSURES:** The parties propose the following schedule:

- 20 • The parties' initial expert disclosures shall be served September 26, 2025, 60 days
21 prior to the discovery cutoff.
- 22 • The parties' rebuttal expert disclosures shall be served October 27, 2025, 30 days
23 after the initial disclosure of experts.

24 6. **DISPOSITIVE MOTIONS:** Dispositive motions, if any, shall be filed by December 26, 2025,
25 which is 30 days after discovery cutoff.

26 7. **PRETRIAL ORDER:** A Joint Pretrial Order shall be filed by January 26, 2026, which is 30
27 days after the deadline for filing dispositive motions. However, if any dispositive motions are
filed, then the Joint Pretrial Order shall be due 30 days after decision on such motion(s).

Disclosures under Fed. R. Civ. P. 26(a)(3), and any, objections thereto, shall be included in the Joint Pretrial Order.

8. **ALTERNATIVE DISPUTE RESOLUTION:** The parties met and conferred regarding the possibility of using alternative dispute resolution processes, namely settlement conference, arbitration and mediation. The parties agree that alternative dispute resolution would not be effective at this time, but they are willing to revisit this issue after conducting discovery.

9. **ALTERNATIVE FORMS OF CASE DISPOSITION:** The parties met and conferred regarding the use of a magistrate judge for all purposes or to submit to the Short Trial Program. The parties do not agree to have this matter heard by a magistrate judge at this time, but they are willing to revisit this issue at a later time.

10. **ELECTRONIC DISCOVERY:** The parties discussed whether they intend to present evidence in electronic format to jurors for the purpose of jury deliberations. At this time, the parties have not made any stipulations regarding providing discovery in an electronic format compatible with the Court's electronic jury evidence display system.

11. **EXTENSIONS OR MODIFICATION OF DISCOVERY PLAN AND SCHEDULING ORDER:** Any stipulation or motion must be made no later than 21 days before the subject deadline. Requests to extend discovery deadlines must comply fully with LR 26-3.

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IT IS SO ORDERED.

Dated: May 30, 2025

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Nancy J. Koppe
United States Magistrate Judge

1 Dated May 29, 2025

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3 **THE POWELL LAW FIRM**

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